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Plaintiffs' Liaison Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:
*M.L., on behalf of minor A.W. v. Meta
Platforms, Inc., et al.*, 4:23-cv-03801

*F.R. filed on behalf of B.R. v. Meta
Platforms, Inc., et al.*, 4:23-cv-04102

*J.H. filed on behalf of minor C.H. v. Meta
Platforms, Inc., et al.*, 4:23-cv-03842

A.H., filed on behalf of Minor A.R. v. Meta

**DECLARATION OF JENNIE LEE
ANDERSON IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS TO THE DECLARATION OF
JENNIE LEE ANDERSON IN SUPPORT
OF PLAINTIFFS' FIFTH *EX PARTE*
APPLICATION FOR APPOINTMENT
OF GUARDIANS *AD LITEM***

1 *Platforms, Inc., et al.*, 4:23-cv-3798

2 *L.L. on behalf of A.L. v. Meta Platforms,*
3 *Inc., et al.*, 4:23-cv-04262

4 *K.C and on behalf of K.C. v. Meta Platforms,*
5 *Inc., et al.*, 4:23-cv-03179

6 *S.M., individually and on behalf of N.M. v.*
7 *Meta Platforms Inc., et al.*, 4:23-cv-03978

8
9 I, Jennie Lee Anderson, do hereby declare and state as follows:

10 1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted
11 to practice before the courts of the State of California and in the Northern District of California. I
12 am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent*
13 *Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of
14 record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I
15 make this declaration of my own personal knowledge and, if called as a witness, I could and
16 would testify competently to the matters stated below.

17 2. I make this declaration in support of Plaintiffs' Administrative Motion to File
18 Under Seal Exhibit to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Fifth *Ex*
19 *Parte* Application for Appointment of Guardians *Ad Litem* ("Administrative Motion to Seal").

20 3. For the reasons set forth in Plaintiffs' administrative motion to seal filed on
21 February 28, 2023 (ECF No. 147) and the Administrative Motion to Seal filed herewith, Plaintiffs
22 seek to seal the Exhibits attached to the Declaration of Jennie Lee Anderson in Support of
23 Plaintiffs' Fifth *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Anderson
24 Declaration").

25 4. True and correct copies of the following Exhibits to the Anderson Declaration
26 are as follows and attached hereto:

- 27 • *M.L., on behalf of minor A.W. v. Meta Platforms, Inc., et al.*, 4:23-cv-03801
28 (Exhibit 1)

- 1 • *F.R. filed on behalf of B.R. v. Meta Platforms, Inc., et al.*, 4:23-cv-04102
2 (Exhibit 2)
- 3 • *J.H. filed on behalf of minor C.H. v. Meta Platforms, Inc., et al.*, 4:23-cv-03842
4 (Exhibit 3)
- 5 • *A.H., filed on behalf of Minor A.R. v. Meta Platforms, Inc., et al.*, 4:23-cv-3798
6 (Exhibit 4)
- 7 • *L.L. on behalf of A.L. v. Meta Platforms, Inc., et al.*, 4:23-cv-04262
8 (Exhibit 5)
- 9 • *K.C. and on behalf of K.C. v. Meta Platforms, Inc., et al.*, 4:23-cv-03179
10 (Exhibit 6)
- 11 • *S.M., individually and on behalf of N.M. v. Meta Platforms Inc., et al.*, 4:23-cv-
12 03978
13 (Exhibit 7)

14 5. Pursuant to Civil Local Rule 7-11, on June 15, 2023, Defendants agreed to, a standing
15 stipulation that the individual applications seeking appointment of guardians ad litem in this case
16 may be filed under seal. Liaison Counsel for Defendants also confirmed that, in so stipulating,
17 Defendants do not waive, and expressly reserve, their right to seek an order or orders in the future
18 to unseal individual applications and/or require parents who wish to proceed pseudonymously
19 going forward make a showing of good cause.

20 I declare under penalty of perjury pursuant to the laws of the United States of America that
21 the foregoing is true and correct.

22 Dated: September 19, 2023

Respectfully submitted,

23 /s/Jennie Lee Anderson
24 Jennie Lee Anderson
25 Plaintiffs' Liaison Counsel

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